

## Exhibit 17

1           IN THE UNITED STATES DISTRICT COURT  
2           FOR THE NORTHERN DISTRICT OF OHIO  
3           EASTERN DIVISION

4           - - -  
5        IN RE: NATIONAL : HON. DAN A.  
6           PRESCRIPTION OPIATE : POLSTER  
7           LITIGATION : MDL NO. 2804  
8           :  
9        This document relates to: : Case No. 17-MD-2804  
10           :  
11           The County of Summit, Ohio :  
12           Ohio et al. v. Purdue Pharma :  
13           L.P., et al., Case No. :  
14           17-OP-45004 :  
15           :  
16           The County of Cuyahoga v. :  
17           Purdue Pharma Purdue Pharma :  
18           L.P., et al., Case No. :  
19           18-OP-45090 :  
20           :  
21           - - -

22           - HIGHLY CONFIDENTIAL -

23           SUBJECT TO FURTHER CONFIDENTIALITY REVIEW

24

1           VOLUME I

2           - - -

3        May 9, 2019

4

5           Videotaped deposition of  
6           CRAIG J. McCANN, Ph.D., CFA, taken  
7           pursuant to notice, was held at the law  
8           offices of Morgan Lewis & Bockius, LLP,  
9           1111 Pennsylvania Avenue, NW, Washington,  
10           D.C., beginning at 10:03 a.m., on the  
11           above date, before Michelle L. Gray, a  
12           Registered Professional Reporter,  
13           Certified Shorthand Reporter, Certified  
14           Realtime Reporter, and Notary Public.

15

16           - - -

17

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Testimony of:

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CRAIG J. McCANN, Ph.D., CFA

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7	By Ms. McEnroe	16
8	By Mr. Eppich	253
9	By Mr. Boehm	323

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E X H I B I T S

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14

15	NO.	DESCRIPTION	PAGE
16	McCann-1	Notice of Videotaped Deposition	17
17			
18	McCann-2	Banker Box Initial Report 1-11 Appendices Supplemental Report A through F Appendices Second Supplemental Report Appendices 1 and 2 & Attachment	23
19			
20			
21			
22			
23			
24			

1       that we would source ourselves during our  
2       work, researching the data that we  
3       receive. So just take for an example, D,  
4       E, F, G, H, those are all examples, as we  
5       were -- and B and C, these are all items  
6       that as we were developing the data last  
7       summer, we sourced without asking for it  
8       from the plaintiffs' counsel or the  
9       plaintiffs' counsel providing it to us  
10      without us asking for it, which were the  
11      two possibilities your question covered.

12           Q.     Thank you. So was there  
13      anything that you asked for in forming  
14      your opinions that plaintiffs' counsel  
15      did not give you?

16           A.     No, not that I can think of.

17           Q.     Let's take a quick look on  
18      Page 4 of your initial report. Paragraph  
19      13, under heading "Summary of Opinions."

20                  Do you see where I am?

21           A.     Yes.

22           Q.     Paragraph 13 says, "Based  
23      upon my comparison of the ARCOS data  
24      produced by the DEA and the public ARCOS"

1 retail drug summary reports, I conclude  
2 that, after correcting a relatively small  
3 number of records, the ARCOS data  
4 produced by the DEA is reliable."

5 Did I read that correctly?

6 A. Yes.

7 Q. And then if we go ahead to  
8 Paragraph 17, still under "Summary of  
9 Opinions," the first sentence there says,  
10 "I conclude from my review of the ARCOS  
11 data, the retail drug summary reports,  
12 and transaction data produced in  
13 discovery by the defendants, that the  
14 ARCOS data is reliable."

15 Did I read that accurately?

16 A. Yes.

17 Q. And then that paragraph  
18 continues, correct?

19 A. Yes.

20 Q. So is it fair to say that  
21 you are of the opinion that the ARCOS  
22 data is generally reliable?

23 THE WITNESS: Bless you.

24 Yes, with the qualification

1                   that I make throughout the report,

2                   that is my opinion.

3 BY MS. McENROE:

4                   Q. An in -- at, like, a  
5                   30,000-foot level, the sort of first half  
6                   of your report is largely taking  
7                   transactional data that defendants have  
8                   produced in this litigation, comparing it  
9                   to the ARCOS data to help you form that  
10                  opinion that ARCOS data is reliable?

11                  I'm not trying to make this  
12                  one a trick question. If you want to  
13                  describe it a different way, go ahead.

14                  A. I would -- I would just add  
15                  to that a comparison with the retail drug  
16                  summary reports, which is what we looked  
17                  at on Paragraph 13. But if you add  
18                  comparing the ARCOS data that we received  
19                  from the DEA, the retail drug summary  
20                  reports, and the defendant transaction  
21                  data, comparing those three views of what  
22                  should be the same underlying data, we  
23                  think that at least those three views are  
24                  consistent, is how I would describe it.

1 something on the DEA's end of storing  
2 those data?

3 A. No, I tried to make that  
4 clear earlier. I do not -- I can't  
5 distinguish between those two.

6 Q. You don't know. But in any  
7 event, you are not suggesting that with  
8 respect to the transactions you're  
9 referring to now that they were in some  
10 way withheld from the DEA, correct?

11 A. No. If anything, the  
12 opposite.

13 Q. Now, going back to the  
14 portion of your report where you say that  
15 Cardinal's reporting had nearly perfect  
16 overlap --

17 A. Yes.

18 Q. -- with what you found in  
19 the ARCos database.

20 You remember that, right?

21 A. Correct.

22 Q. And indeed, you said in your  
23 report that over 99.9 percent of  
24 Cardinal's transactional data was a match

1 with what you found in the DEA's ARCOS

2 database. Do you remember that?

3 A. I'm sorry, could you refer

4 me to the page and paragraph, please?

5 Q. Sure. Happy to.

6 If you look at Page 32, you

7 have a table. I believe it's Table 14?

8 A. Yes.

9 Q. And you have in this table  
10 identified several distributors, correct?

11 A. Correct.

12 Q. And the first one you list  
13 is Cardinal Health.

14 Do you see that?

15 A. Yes.

16 Q. And in that first set of  
17 columns, you've written transactions that  
18 are in both datasets.

19 Do you see that?

20 A. Yes.

21 Q. And I understand that to  
22 mean that you're trying to calculate a  
23 percentage of transactional data that  
24 matches up perfectly with what you find

1 in ARCOS, right?

2 A. Correct.

3 Q. And in the case of Cardinal

4 Health, you determined that 99.9 percent

5 of the transactional data matched up

6 perfectly with what you found in ARCOS,

7 right?

8 A. After excluding the known

9 non-overlaps, just as it says in the

10 title, that's correct.

11 Q. Is it typical for you, when

12 you're reviewing very large datasets and

13 comparing maybe kind of corresponding

14 large datasets, to find small

15 discrepancies here and there?

16 A. Yes.

17 Q. Now, as I understand it, and

18 please do correct me if I've

19 misunderstood something, the ARCOS data

20 that you used for purposes of your

21 analyses as -- as set forth in your

22 report covered January 2006 through

23 December 2014; is that right?

24 A. Yes.